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January 24, 2020

Via ECF

Honorable Joseph A. Dickson
United States District Court
Martin Luther King Bldg. & Courthouse
50 Walnut Street
Newark, NJ 07101

Re: *Neale, et al. v. Volvo Cars of North America, LLC, et al.*
Civil Action No. 2:10-cv-04407-MCA-JAD

Dear Judge Dickson:

Along with my co-counsel, I represent the Plaintiffs in this case. In our last letter dated January 10, 2020 (Dkt. 476), we indicated that we would provide another update by today as to the status of obtaining from Experian information that will be relevant to Plaintiffs' forthcoming renewed motion for class certification.

We understand from Experian's counsel, Ms. Sun, that she will be conferring with her client later today, and we hope to have more specific information on this issue after that call. We propose that, after we hear back from Ms. Sun, Plaintiffs provide the Court with a more detailed update early next week concerning whether we will be able to obtain this information voluntarily, or will need to seek assistance from the Court.

We are available at the Court's convenience to discuss these matters.

Respectfully submitted,



Benjamin F. Johns

cc: All Counsel of Record (via CM/ECF)
Jennifer Sun, Esquire (jennifersun@jonesday.com)